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Attorneys for Defendants  
State of California by and through California  
Highway Patrol and Officer Ramon Silva

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN AND  
CARLOS ALANIZ,  
INDIVIDUALLY AND AS  
SUCCESSORS-IN-INTEREST TO  
JOHN ALANIZ, DECEASED,

Plaintiff,

v.

STATE OF CALIFORNIA;  
RAMON SILVA; AND DOES 1-10,  
INCLUSIVE,

Defendant.

Case No.: 2:23-cv-07532-DMG-SSC

**DEFENDANTS' NOTICE OF  
MOTION AND MOTION TO  
MODIFY SCHEDULING ORDER;  
MEMORANDUM OF POINTS AND  
AUTHORITIES; AND  
DECLARATIONS OF LEE H.  
ROISTACHER AND CAROLYN  
LLOYD**

Date: February 7, 2025  
Time: 9:30 a.m.  
Dept: 8C  
Judge: Hon. Dolly M. Gee

Complaint Filed: July 28, 2023  
Trial Date: April 15, 2025

**TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF  
RECORD:**

**PLEASE TAKE NOTICE** that on February 7, 2025 at 9:30 a.m. or as soon  
thereafter as the matter may be heard in Courtroom 8C of the above-entitled court,  
located at 50 West 1st Street, Los Angeles, California, 90012, defendants State of  
California by and through California Highway Patrol and Officer Ramon Silva  
will move the Court under Federal Rule of Civil Procedure 16(b) to modify the  
scheduling order for "good cause" to continue for 90-days the March 18, 2025

1 final pretrial conference (and associated “trial filings”) and the April 15, 2025 trial  
2 date.

3 This motion will be based on this notice and motion, the memorandum of  
4 points and authorities, the declarations of Lee H. Roistacher and Carolyn Lloyd,  
5 and the pleadings and papers filed herein.

6 This motion is made following the conference of counsel pursuant to L.R.  
7 7-3 which took place on December 20, 2024.

8  
9 Dated: January 3, 2025

Dean Gazzo Roistacher LLP

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11 By: /s/ Lee H. Roistacher

12 Lee H. Roistacher  
13 Kimberly A. Sullivan  
14 Attorneys for Defendants  
15 State of California by and through  
16 California Highway Patrol and  
17 Officer Ramon Silva  
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